

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>Docket No.: 1:13-CR-383-9</b>
<b>v.</b>	)	<b>(Judge O’Grady)</b>
	)	
<b>PHILLIP SIMPSON,</b>	)	
	)	
<b>DEFENDANT</b>	)	

**DEFENDANT’S REQUEST FOR TRIAL PROCEDURES**

COMES NOW the defendant, Philip Simpson, by Gregory B. English, his court-appointed attorney, and requests that this court adopt the following procedures for the trial in this case.

**Objections**

Defendant requests that if the counsel for one defendant makes an objection in this case the court deem that objection to apply to all defendants unless the attorney for any other defendant expressly states that he does not join in it. Defendant respectfully submits that this procedure will save the court time by avoiding the needless echoing of objections during trial.

**Order of Cross-Examination**

Defendant also requests that this court allow the defense attorneys to determine in which order they will cross-examine prosecution witnesses and, if they elect to present evidence on behalf of the defendants, to determine themselves in what order they will proceed. Counsel recognizes that ordinarily the custom is to hear from the defendants in the order in which they

are listed in the indictment. However, we respectfully submit that if the court adopts this procedure time will be saved during the course of the trial.

**Trial Scheduling**

Because this trial may take a month to complete and both the court and defense counsel may have other matters arise during this period, we respectfully request that this court set aside one day each week when it will not sit in this case. This will allow the parties an opportunity to attend to other matters that inevitably will arise. This will also give counsel for both sides one day in which to coordinate their presentation of evidence for the remaining portion of the trial which should streamline the trial. Counsel believes that this procedure will ultimately save the court time.

Respectfully submitted,

/signed/

---

Gregory B. English, VA Bar #25928  
The English Law Firm, PLLC  
601 King Street, Suite 406  
Alexandria, Virginia 22314  
(703) 739-1368/Fax (571) 312-6445  
*Counsel for Defendant*

**Certificate of Service**

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 26<sup>th</sup> day of March, 2014, which will send a notification of such filing (NEF) to the following and all counsel of record:

Alexander T. H. Nguyen and Jay V. Brabhu  
Assistant U.S. Attorneys  
2100 Jamieson Avenue  
Alexandria, Virginia 22314

/s/

---

Gregory B. English